

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

IN RE: SANTA FE NATURAL TOBACCO
COMPANY MARKETING & SALES
PRACTICES AND PRODUCTS LIABILITY
LITIGATION

Lead Case No. MD 16-2695 JB/LF

This Document Relates To All Actions

**CERTIFICATE OF SERVICE OF DEFENDANTS' FEDERAL RULE OF CIVIL
PROCEDURE 26(a)(1) DISCLOSURES**

Defendants Santa Fe Natural Tobacco Company, Inc. ("Santa Fe") and Reynolds American Inc. ("RAI")¹ hereby certify that Defendants' Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)(1) and a copy of this Certificate were served on May 31, 2016 via electronic mail upon all Plaintiffs' Co-Lead Counsel of record.

Dated: May 31, 2016

Respectfully Submitted,

/s/ David M. Monde

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¹ Defendants assert that RAI is a holding company that neither manufactures nor sells any product, and which has no general or specific jurisdictional presence in New Mexico or in any district of a transferor court and thus this Court lacks personal jurisdiction over it. By joining Santa Fe in this mandatory pleading, RAI does not waive its right to challenge personal jurisdiction at the appropriate time.

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